

Joseph A. Garver, a witness called on behalf of the plaintiffs, after being duly sworn by Wilbur F. Sheffield, Jr., one of the standing examiners of the Circuit Court For Frederick County, Maryland, deposes and says:

By: Mr. Fout

Q. Please state your name, age and residence?

A. Joseph A. Garver, I am 53 years old and I live near Johnsville, Frederick County, Maryland.

Q. Are you acquainted with Mr. Joseph Six and Mrs. Nellie S. Nusbaum?

A. Yes, I have known them all my life, and have lived just one farm from the farm owned by them.

Q. Then you have been over the Six farm on many occasions?

A. Yes, many times.

Q. Are you acquainted with a so called mine on the Six Farm?

A. Yes, I have set traps around the mine as early as 1930.

Q. At that time Mr. Garver was any mining activity being conducted?

A. No none, nor has any mining activity been conducted that I could see since that time. I am sure no rocks were hauled away by wagon or truck, I would have noticed something like that. However, they could have taken rock samples away and I would not have seen that.

Q. Described this mine area on the Six Farm?

A. There are two holes in the ground over there in the bushes, next to the Beaver Dam Church, the holes are small enough to be called "Sink Holes". The holes are about 3 or 4 feet apart, are full of water and grown up with weeds and bushes.

Q. Is there a roadway extending from this area to the public road?

A. No.

Q. Is there any building near the holes?

A. Yes there was a little shack which is about rotted down.

TO THE GEN. INT. AS PROPOUNDED BY WILBUR F. SHEFFIELD, Jr  
NOTHING FURTHER.

  
Joseph A. Garver